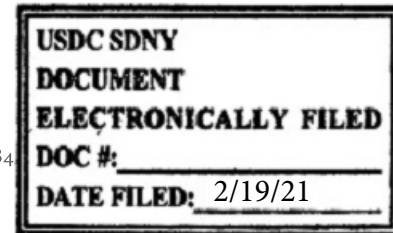


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February 19, 2021

VIA ECF

Honorable Barbara Moses
United States District Court
Southern District of New York
New York, New York 10007

MEMO ENDORSED

Re: *Morgan Art Foundation Ltd. v. McKenzie, et al.*, 18-cv-04438 (AT); *Morgan Art Foundation Ltd., et al. v. Brannan*, 18-cv-08231 (AT)

Dear Judge Moses,

I write on behalf of the Plaintiffs, with the consent of all parties, to request a two-week stay of the above-captioned actions.

Plaintiffs, the Estate, Jamie Thomas, and the Star of Hope are on the verge of signing an agreement that will resolve the disputes between MAF, Thomas, and the Estate. The SOH needs to confer with its board members to confirm and respond to certain deal points, but informed us today that the board members are unavailable until the beginning of next week. The SOH further informed MAF and the Estate that it expects to respond at the beginning of next week, and that it is confident we will be able to quickly resolve the remaining issues. Meanwhile, however, the parties have scheduled three depositions for next week, starting Monday, and a fourth at the beginning of March. Given the near certainty of a deal early next week that should substantially narrow the scope of discovery, the parties respectfully request the two-week stay so that they do not need to conduct these depositions as scheduled. If the Court grants this request, the parties would inform the Court immediately after an agreement is executed or if, for reasons we don't anticipate, it appears we will be unable to resolve the few remaining issues.

Respectfully submitted,

/s/ Luke Nikas

Luke Nikas

Application GRANTED. Discovery in both actions shall be STAYED through and including **March 4, 2021**. The parties shall promptly inform the Court when an agreement has been executed and shall, at that time, propose a schedule for concluding any remaining discovery not rendered moot by the agreement. If there is no executed agreement by March 3, 2021, the parties shall submit a status letter on that date. SO ORDERED.

Barbara Moses, U.S.M.J.
February 19, 2021

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